

UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

Albert William Bleau Jr.

2005 OCT -4 A 8:36

Plaintiff

U.S. DISTRICT COURT
DISTRICT OF MASS.

Vs.

Civil Action
No. 04 - 10469REK

Greater Lynn Mental Health
& Retardation Association, et al,

Defendants

Amendment to Plaintiff's

Objection To Defendant Greater Lynn Mental Health & Retardation
Association, Inc Motion of August 9, 2005 To Dismiss Plaintiff's Breach Of
Contract Claim or For Partial Summary Judgment

And

Plaintiff Albert W. Bleau Jr. Motion for Summary Judgment Of Breach Of
Contract Claim & To Continue And Expand Discovery To Include Damages
and Rescission

Plaintiff Albert W. Bleau Jr. objected to defendant Greater Lynn Mental Health & Retardation Association's motion for dismissal or partial summary judgment of plaintiff's claim for breach of contract in an Objection filed on August 29, 2005.

Additionally, on August 29, 2005, the Plaintiff, in the alternative moved that the Court grant the Plaintiff's motion for summary judgment on his breach of contract claim.

Plaintiff also requested that discovery be ordered to assess damages on the breach of contract claim and on a possible claim for rescission and that discovery expand to include grounds for contract rescission and continue on all outstanding issues and that discovery include pre November 2000 actions of the defendants to determine claims and damages on all outstanding issues including defamation

and ADA and justification for rescission.

In support of his objection and his motions, Albert W. Bleau Jr. submitted an accompanying memorandum of law and Local Rule 56.1 Concise Statement of Material Facts and an objection to Defendant's August 9, 2005 Local Rule 56.1 Statement.

Plaintiff now submits an additional accompanying Memorandum of Law that Provides additional argument to support plaintiff's August 29, 2005 Memorandum and an additional Local Rule 56.1 Concise Statement of Material Facts that provides additional Facts with an attached chronology and additional documents.

Respectfully submitted,



Albert W. Bleau Jr.
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Dated: October 4, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon all counsel of record by First Class Mail on October 4-6, 2005.



Albert W. Bleau Jr.